

1 Mark Punzalan (CA Bar No. 247599)
Email: mark@chanpunzalan.com
2 Nicole Daryanani (CA Bar No. 328068)
Email: nicole@chanpunzalan.com
3 CHAN PUNZALAN LLP
2000 Alameda de las Pulgas, Suite 154
4 San Mateo, CA 94403
Telephone: 650.362.4150
5 Fax: 650.362.4151

6 *Counsel for Defendants*
7 *Jadoo TV, Inc. and Sajid Sohail*

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 DISH NETWORK L.L.C.,

12 Plaintiff,

13 vs.

14 JADOOTV, INC., SAJID SOHAIL,
15 HASEEB SHAH, EAST WEST AUDIO
16 VIDEO, INC., and PUNIT BHATT,

17 Defendants.
18

Case No. 2:18-cv-09768-FMO-KS

**SUPPLEMENTAL DECLARATION OF
SAJID SOHAIL IN SUPPORT OF
MOTION TO TRANSFER VENUE TO
THE NORTHERN DISTRICT OF
CALIFORNIA**

Date: March 12, 2020

Time: 10:00 am

Courtroom: 6D

Judge: Honorable Fernando M. Olguin

19 I, Sajid Sohail, declare the following:

20 1. I am one of the named defendants in the above-entitled action. This declaration is based on
21 my own personal knowledge. If called to testify, I could and would do so competently as to the matters set
22 forth herein. I make this declaration in support of the pending Motion to Transfer Venue to the Northern
23 District of California.

24 2. JadooTV has operated at a loss for the past several years. While the company has stabilized
25 enough to lift the bankruptcy stay in this action, it is still losing money.

26 3. JadooTV's sales to retailers in the Northern and Eastern Districts of California account for
27 roughly 65% of its total California sales, while its sales to retailers in the Central and Southern Districts of
28 California account for the remaining 35% of its total California sales. California as a whole is not

1 JadooTV's leading sales market. Most JadooTV resellers in the Central District of California are very small
2 or very recent additions. Some of those resellers have never been sold any JadooTV devices.

3 4. JadooTV currently anticipates calling at least six resellers of JadooTV products as
4 witnesses at trial. Each of these resellers lives and works in the Northern District of California:

- 5 • Mohammad Essa (based in Sacramento);
- 6 • Onkar Singh (based in Fremont);
- 7 • Qais Nuristani (based in Carmichael);
- 8 • Masood Walizada (based in Sacramento);
- 9 • Tamim Mojadadi (based in Concord); and
- 10 • Wahidullah Safi (based in Fremont).

11 5. JadooTV has made sales to East West Audio Video, Inc. since at least 2010. A true and
12 correct copy of JadooTV's sales records to the company is attached here as **Exhibit 1**. I have personally
13 been to the East West Audio Video store in Artesia, CA exactly once, on or around February 3, 2017. A
14 copy of my flight confirmations for that trip is attached as **Exhibit 2**. Photos from that trip are attached as
15 **Exhibit 3**. At that meeting, Punit Bhatt remarked that he was glad to finally meet the founder of JadooTV.
16 That is the only time I met Mr. Bhatt. I did not visit the store at the end of 2015, as he has claimed.

17
18 Dated: February 27, 2020

/s/ Sajid Sohail